



Australian Government
Civil Aviation Safety Authority

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SUMMARY OF PROPOSED CHANGE

Part 66 exclusion removal by self-study

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Acknowledgement of Country

The Civil Aviation Safety Authority (CASA) respectfully acknowledges the Traditional Custodians of the lands on which our offices are located and their continuing connection to land, water and community, and pays respect to Elders past, present and emerging.

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1 Introduction

This consultation covers CASA's proposal to amend the Part 66 legislation to provide for exclusions to be removed from maintenance engineer licences via the CASA self-study pathway. Exclusion removal by self-study would be an option in addition to the current exclusion removal pathway through Part 147 maintenance training organisations (MTO).

1.1 Background

Part 66 of the *Civil Aviation Safety Regulations 1998 (CASR)* and its Manual of Standards (MOS) set out the requirements for the training, qualification and licensing of aircraft maintenance engineers.

The scheme provides for Part 66 licences to be granted in categories and subcategories by reference to kinds of aircraft, depending on the study taken, examinations passed, and experience gained. For example, categories include 'airframes', 'powerplant systems' (engines), and 'avionics systems.'

The scheme also provides for licences to be granted with 'exclusions', whereby a person's licence is expressed not to authorise certification of maintenance on specified aircraft systems or subsets of aircraft systems, based on the study taken, examinations passed, and experience gained by the licence holder.

At present, Part 66 legislation is quite restrictive in that exclusions can only be removed from a licence via training and assessment carried out by a Part 147 MTO that is approved by CASA to conduct licence category training.

Currently, to remove an exclusion from a category or subcategory of licence, an individual must satisfy the following theoretical and competency requirements relevant to the excluded aircraft system or subset the person is applying to have removed:

- completion of basic knowledge and competency requirements (see section 66.A.25 and Appendix I of the Part 66 MOS)
- completion of the unit(s) of competency applicable to a particular exclusion, as listed in Appendix VIII of the Part 66 MOS.

Feedback received from industry during the Part 66 post implementation review (PIR), indicated a level of frustration, difficulty and uncertainty with aircraft engineer licensing training requirements. To address this feedback, CASA introduced (in August 2021) a Part 66 self-study training and examination pathway, as the solution to some of industry's concerns relating to licensing training. This new pathway improved flexibility and accessibility to the Australian aircraft maintenance engineer training and licensing scheme.

1.2 Proposed changes

To provide further relief to industry, specifically for exclusion removal training, CASA proposes to permit Part 66 licence holders to utilise the flexibility of the self-study pathway to remove exclusions from their category or subcategory of licence.

To facilitate this change in policy, an amendment to regulation 66.072 of CASR and an amendment to section 66.A.70 of the Part 66 MOS are both required.

- Regulation 66.072 of CASR allows for the holder of an aircraft engineer licence that is subject to an exclusion of an aircraft system or a subset of an aircraft system, to apply to CASA for the removal of the exclusion. CASA must remove the exclusion if CASA is satisfied, based on evidence from the holder that the holder has met the requirements necessary for the removal of the exclusion.
- Section 66.A.70 of the Part 66 MOS specifies the basic knowledge, competency, and the practical experience requirements that are necessary and required to be gained by the holder of a licence who applies to CASA to remove an exclusion from a category or subcategory of their licence.

Currently the Part 66 MOS does not prescribe any specific requirements relating to the use of self-study for exclusion removal, hence there is a need to amend the Part 66 MOS to provide such detail.

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2 Reference material

2.1 Acronyms

The acronyms and abbreviations used in this SPC are listed in the table below.

Table 1: Acronyms

Acronym	Description
ASAP	Aviation Safety Advisory Panel
CAR	Civil Aviation Regulations 1988
CASA	Civil Aviation Safety Authority
CASR	Civil Aviation Safety Regulations 1998
LAME	Licensed Aircraft Maintenance Engineer
MOS	Manual of Standards
MTO	Maintenance Training Organisation
OIA	Office of Impact Analysis
OPC	Office of Parliamentary Counsel
PIR	Post Implementation Review
SPC	Summary of Proposed Change
TWG	Technical Working Group

2.2 Definitions

Terms that have specific meaning within this SPC are defined in the table below. Where definitions from the civil aviation legislation have been reproduced for ease of reference, these are identified by 'grey shading'. Should there be a discrepancy between a definition given in this SPC and the civil aviation legislation, the definition in the legislation prevails.

Table 2: Definitions

Term	Definition
OPC	The Office of Parliamentary Counsel is responsible for drafting and publishing the laws of the Commonwealth of Australia.

2.3 References

Legislation

Legislation is available on the Federal Register of Legislation website <https://www.legislation.gov.au/>

Table 3: Legislation references

Document	Title
Civil Aviation Safety Regulations	Civil Aviation Safety Regulations 1998 (CASR)
Part 66 of CASR	Continuing airworthiness—aircraft engineer licences and ratings
Part 145 of CASR	Continuing airworthiness—Part 145 approved maintenance organisations
Part 147 of CASR	Continuing airworthiness—Part 147 maintenance training organisations
Part 66 MOS	Part 66 Manual of Standards

2.4 Forms

CASA's forms are available at <http://www.casa.gov.au/forms>

Table 4: Forms

Form number	Title
Form 546	Removal of Exclusions or Limitations/Conditions on an Aircraft Engineer Licence

3 Purpose and scope of the proposed amendments

This Summary of Proposed Change (SPC) provides details of amendments CASA is proposing to regulation 66.072 of CASR and the Part 66 MOS that collectively will permit Part 66 licence holders to utilise the self-study training and examination pathway to remove exclusions from their licence.

The amendment to regulation 66.072 of CASR would give existing licence holders the option to apply to CASA for removal of an exclusion from their licence via use of the self-study pathway. The regulation amendment includes references to sections of the Part 66 MOS, where the training, assessment and practical experience requirements to remove an exclusion from a licence are specified. However, currently the Part 66 MOS does not prescribe any specific requirements relating to the use of self-study for exclusion removal, hence there is a need to amend the Part 66 MOS to provide such detail.

CASA proposes to amend the Part 66 MOS to specify the basic knowledge, examinations and basic practical experience requirements to be met by a licence holder who has used the self-study training and examination pathway to remove an exclusion from the category or subcategory of their licence.

Additionally, CASA will use this drafting opportunity to update the type rated aircraft types and type rating endorsement tables provided in Appendix IX of the Part 66 MOS.

3.1 Key change proposals

3.1.1 Civil Aviation Safety Amendment (Minor Changes) Regulations 2025: self-study pathway for removal of exclusion from aircraft engineer licence

Key change 1

The regulation amendment instrument will:

- amend subregulation 66.072(2) of CASR to state that CASA must remove the exclusion if CASA is satisfied, on the basis of evidence mentioned in subregulation (3), that the holder of the licence has met the requirements necessary for the removal of the exclusion.
- amend subregulation 66.072(3) of CASR to specify the types of evidence CASA must receive from the holder of a licence, subject to which training pathway they have used (i.e., the Part 147 MTO pathway, or the self-study pathway), to remove the exclusion from their licence.

3.1.2 Part 66 Manual of Standards Amendment Instrument 2025 (No.2)

Key change 1

The MOS amendment instrument will amend paragraph 66.A.70(b) of the Part 66 MOS to specify:

- for the MTO training pathway:
 - the basic knowledge and competency requirements for the aircraft system or subset under section 66.A.25 of the Part 66 MOS,

to be gained by the holder of a licence to remove an exclusion from a category or subcategory of their licence.

Note: The proposed amendments would not change the requirements for exclusion removal via a Part 147 MTO.

- for the self-study training pathway:

- the basic knowledge requirements (i.e. self-study exams) for the aircraft system or subset under section 66.A.25 of the Part 66 MOS
- the basic practical experience requirements on the excluded aircraft system or subset that is required under the Part 66 Basic Practical Experience Logbook,

to be gained by the holder of a licence to remove an exclusion from a category or subcategory of their licence.

Note: If a licence holder is undertaking self-study for removal of an exclusion, in addition to successfully passing the basic knowledge module exam(s) relevant to the exclusion being removed, the applicant must also record evidence of their acquisition of the basic practical maintenance experience on the excluded aircraft system or subset that is required in their Part 66 Basic Practical Experience Logbook.

Other amendments and minor editorial corrections.

Additionally, the amendment instrument will:

- remove the commercial designation information (for the EH-60A and UH-60A) incorrectly listed for type certificate (TC) holder – PICKERING AVIATION INC, in Appendix IX, Table 5 and Table 2, Part 2.
- add the UH-60L helicopter as a new aircraft type and update the type rating endorsement information to include the UH-60L, to the PICKERING AVIATION INC, type certificate (TC) holder, in Appendix IX, Table 5 and Table 2, Part 2.
- remove the commercial designation information (for the S-70A, S-70B and S-70C) incorrectly listed for type certificate (TC) holder – SIKORSKY AIRCRAFT, in Appendix IX, Table 5 and Table 2, Part 2.
- add the PC-12/47G as a new aircraft type to the PILATUS AIRCRAFT, type certificate (TC) holder, in Appendix IX, Table 1.
- add the GVIII-G700 (Gulfstream GVIII (RRD BR730)) as a new aircraft type and type rating endorsement, to the GULFSTREAM AEROSPACE Corporation, type certificate (TC) holder, in Appendix IX, Table 1.
- update the 'aircraft type' column heading information, in Appendix IX, Table 2, Part 2.

4 Previous consultations

Use of self-study as an optional pathway for exclusion removal training has been considered previously, originally as an element of the self-study proposal (introduced in August 2021) and later, as an element of the modular licensing proposal (introduced in December 2023).

4.1 Part 66 post implementation review (PIR) – (consultation Feb to May 2017)

Feedback received from industry during the Part 66 PIR consultation indicated a level of frustration, difficulty and uncertainty with certain elements of aircraft engineer licensing training and requirements.

One of the issues identified by the PIR and discussed by the Aviation Safety Advisory Panel's (ASAP) Part 66 PIR Technical Working Group (TWG), was concern that access to MTO training (including exclusion removal training) is difficult and expensive due to there being only six Part 147 MTOs, five of which are located in major cities on the east coast of the country. 'General consensus' reached by Part 66 TWG members on this issue with support from all was that an alternative training and examination option (a self-study option) should be considered by CASA to address industry's concerns.

4.2 Introduction of the Part 66 self-study training and examination pathway – (consultation Aug to Sep 2019)

From 30 August to 27 September 2019, CASA invited comment on a set of proposed amendments that would introduce a new 'self-study' training and examination pathway, as an alternative to the Part 147 MTO training pathway that would lead to the grant of a Part 66 aircraft engineer licence. Of the 129 submissions received to the consultation, 96 respondents indicated support for the proposal to introduce a new self-study training and examination pathway.

Introduction of the Part 66 self-study training and examination pathway commenced (without the element of exclusion removal training), in mid-August 2021.

4.3 Introduction of the Part 66 modular licensing pathway – (consultation Sep to Oct 2023)

From 14 Sep to 12 Oct 2023, CASA invited comment on a set of proposed amendments that would introduce a modular licensing framework for aircraft maintenance engineers.

Since the introduction of Part 66 in June 2011, CASA received submissions from industry stakeholders indicating that the Part 66 licence pathways are too inflexible. Submissions called for a return to the regulation 31 of the *Civil Aviation Regulations 1988 (CAR)* structure with licence categories that better suit the individual areas of interest and workplace needs.

CASA consulted with the Part 66 TWG on the technical details of the proposed modular licensing structure. In December 2022 CASA published a Discussion Paper on Part 66 modular licensing framework for aircraft maintenance engineers (DP 2218MS).

Respondents generally supported a modular licence structure based on the existing Part 66 knowledge and experience requirements and using exclusions in order to expedite delivery of the intended benefits and outcomes.

Introduction of the Part 66 modular licensing pathway commenced (without the element of exclusion removal training), in December 2023.

4.4 Other amendments and minor editorial corrections

The proposed additions to the lists of type rated aircraft under Appendix IX of the Part 66 MOS, are at the request of individual aircraft operators and maintainers who will shortly commence operations and maintenance of those aircraft. As these amendments only affect the operators and maintainers who made the request, they are generally not consulted prior to a public consultation.

5 Impact on industry

CASA considers that use of the Part 66 self-study training and examination pathway for licence exclusion removal training, as an optional alternative to the existing Part 147 MTO exclusion removal training pathway, will provide the following benefits to industry:

- cost savings to an individual who elects to use self-study for exclusion removal training, compared to the current MTO exclusion removal training pathway. In line with existing arrangements of the self-study training and examination scheme, whereby CASA charges an individual a fixed fee for each Part 66 knowledge module exam sitting, the same arrangements will apply for knowledge module exam sittings for exclusion removal. This type of examination sitting fee, is comparable to the previous licence training scheme used by individuals who sat CASA Basics exams.
- easier access to training by individuals located in remote parts of the country. The majority of CASA approved Part 147 MTOs are geographically located on the east coast of Australia, which makes it difficult for people in regional and remote areas to access Part 147 training. For self-study, a licence applicant is less restricted by their physical location.
- the flexibility for an individual to sit Part 66 knowledge module exams at numerous designated CASA exam sitting locations across the country. As was the case under the CASA Basics and SOE self-study training scheme, CASA continues to provide numerous exam sitting locations under the current Part 66 self-study scheme.
- the individual's ability to study at their own pace and to sit when ready, each module exam required to remove a particular exclusion from a category or subcategory of their licence.

Negative effects of this proposal on industry are:

- the costs incurred for the purchase of (CASA recognised) EASA knowledge module textbooks by individuals who choose self-study as the method of theoretical training for exclusion removal
- the possible impact on existing Part 147 training organisation's student enrolment numbers for exclusion removal training
- the self-study pathway may result in longer timeframes for completion of the knowledge component of exclusion removal training to qualify for removal of an exclusion from a licence. This will be dependent upon the individual's ability to devote time and apply oneself to studying.
- electing to use self-study for exclusion removal training, means an individual will need to successfully pass the 'full' basic knowledge module exam(s) relevant to the exclusion they are seeking to remove. Under CASA's current arrangements with its third-party examination provider (ASPEQ), provision of 'partial' exams (subject specific exams) is not an option. For applicants seeking to sit 'subject specific' module exams, tailored to the particular exclusion they are seeking to remove, the MTO exclusion removal training and examination pathway may prove to be the preferred option.

6 Safety risk analysis

These proposed amendments that will permit Part 66 licence holders to utilise the flexibility of the self-study pathway to remove exclusions from their category or subcategory of licence, do not substantially alter existing regulatory arrangements. As such, a detailed safety risk assessment is not required.

The proposed changes to regulation 66.072 of CASR and to section 66.A.70 of the 66 MOS that will permit the use of self-study for exclusion removal training, are not expected to have any effect on safety. Collectively, they will provide an added benefit for industry to further utilise use of the self-study pathway, which does not diminish or impact the knowledge and experience requirements to remove an exclusion from a licence.

The amendments that add new aircraft type ratings to the lists of type rated aircraft under Appendix IX of the Part 66 MOS, are expected to only effect those individual operators and maintainers who will operate and maintain these new aircraft.

The affected aircraft types have a level of size and complexity that warrants type rating and the associated additional training.

These amendments are considered to have a positive safety effect in that they require licence holders who will maintain and certify maintenance performed on these aircraft to undertake aircraft specific type training, which in turn will enhance aviation safety.

7 Impact analysis

CASA's introduction of a Part 66 'self-study' pathway in August 2021 introduced a level of flexibility into the Australian aircraft maintenance engineer licence training system not previously available under Part 66. As such, it has provided easier access to licence training by individuals who are not located near a Part 147 MTO.

The proposed amendments (described above) to the CASR and the Part 66 MOS will further supplement this level of flexibility for training, by enhancing industry's use of the self-study pathway to enable an individual to remove an exclusion from their category or subcategory of licence.

CASA believes there will be no negative impact on licence applicants, as the proposed use of self-study to remove an exclusion from a licence, is an optional addition to the existing MTO exclusion removal training pathway. CASA will submit a preliminary impact assessment to the Office of Impact Analysis (OIA) and expects that an Impact Analysis will not be required because there is no significant impact to industry from the introduction of self-study as an optional training pathway to remove an exclusion from a licence.

8 Submitting your view and what next

We would like to hear your views on the amendments we have presented. Please review the proposal and provide your feedback.

Your feedback will make a valuable contribution to CASA's policy decision-making process and help to fully inform CASA of the perceived impacts (positive and negative) on the aviation community regarding the proposal.

CASA will consider all comments received as part of this consultation process and incorporate changes as appropriate. Comments on this consultation should be submitted through the online response (CASA Consultation Hub) form by close of business 31 October 2025.